

PETER V. DESSAU, ESQ., SBN 135361
 CHRISTOPHER J. HERSEY, ESQ., SBN 197767
 WESLEY E. MEYER, ESQ., SBN 238064
 MILLER, MORTON, CAILLAT & NEVIS, LLP
 25 Metro Drive, 7th Floor
 San Jose, California 95110
 Telephone: (408) 292-1765
 Facsimile: (408) 436-8272

Attorneys for CH2M HILL, INC. and CH2M HILL COMPANIES, LTD.

THOMAS R. HOGAN, ESQ., SBN 42048
 MARK V. BOENNIGHAUSEN, ESQ., SBN 142147
 HOGAN, HOLMES & USOZ LLP
 333 West Santa Clara Street, Suite 800
 San Jose, California 95113
 Telephone: (408) 292-7600
 Facsimile: (408) 292-7611

Attorneys for MONTEREY REGIONAL WATER POLLUTION AGENCY

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

E-FILED - 11/9/06

MONTEREY REGIONAL WATER)	Case No.: C05 04850-RMW
POLLUTION CONTROL AGENCY, a Joint)	
Powers Agency,)	STIPULATION AND ORDER FOR
)	AMENDED CASE MANAGEMENT
Plaintiff,)	ORDER
vs.)	
)	Civil L.R. 7-12
CH2M HILL, INC.; CH2M HILL)	
COMPANIES, LTD.; and DOES 1 through)	
20, inclusive,)	
)	
Defendants.)	

Plaintiff MONTEREY REGIONAL WATER POLLUTION CONTROL AGENCY
 ("MRWPCA") and DEFENDANTS CH2M HILL, INC. and CH2M HILL COMPANIES, LTD.
 (collectively "CH2M HILL"), by and through their attorneys of record, hereby stipulate to and
 respectfully request that the Court amend the Case Management Order dated April 7, 2006 based
 on the following facts and circumstances:

1 1. WHEREAS, the Court entered its Order after Case Management Conference
2 (“Case Management Order”) on April 7, 2006, setting the following deadlines:

	<u>ITEM</u>	<u>DATE</u>
3	a. Written Discovery	November 3, 2006
4	b. Percipient Witness Depositions	November 3, 2006
5	c. Exchange of Expert Witness Information and Reports	December 1, 2006
6	d. Exchange of Rebuttal Expert Witness Information and Reports	January 8, 2007
7	e. Expert Witness Depositions	February 2, 2007
8	f. Last day to hear Dispositive Motions	February 9, 2007
9	g. Deadline for Joint Pre-Trial Statement	March 2, 2007
10	h. Pre-trial Conference	March 8, 2007
11	i. Jury trial	March 19, 2007

12 2. WHEREAS, following the entry of the Case Management Order and since May
13 2006, the parties have been engaged in meaningful settlement discussions to resolve the current
14 lawsuit; and

15 3. WHEREAS, the parties agreed to stay all discovery during the discussions so that
16 the parties’ resources could be spent on settlement efforts.; and

17 4. WHEREAS, the parties have made significant progress in resolving outstanding
18 issues; and

19 5. WHEREAS, the parties are optimistic that an agreement to end the current lawsuit
20 will be successful, the approval process will make the current discovery and trial deadlines
21 unattainable; and

22 6. WHEREAS, if the current settlement efforts are unsuccessful, the parties have
23 already scheduled a mediation with Justice Edward A. Panelli (JAMS) on December 12, 2006;

NOW THEREFORE, the parties respectfully request the Court to approve an Amended Case Management Order setting the following pre-trial and trial deadlines:

	<u>ITEM</u>	<u>REVISED DATE</u>
a.	Written Discovery	March 5, 2007
b.	Percipient Witness Depositions	March 5, 2007
c.	Exchange of Expert Witness Information and Reports	April 6, 2007
d.	Exchange of Rebuttal Expert Witness Information and Reports	May 7, 2007
e.	Expert Witness Depositions	July 13, 2007
f.	Last day to hear Dispositive Motions	July 13, 2007
g.	Deadline for Joint Pre-Trial Statement	August 3, 2007
h.	Pre-trial Conference	August 9, 2007
i.	Jury trial	August 13, 2007

All other limitations on discovery set forth in the Case Management Order dated April 7, 2006 shall remain unchanged.

SO STIPULATED.

Dated: October 18, 2006

HOGAN HOLMES & USOZ, LLP

By: /s/
 THOMAS R. HOGAN
 Attorneys for Plaintiff MONTEREY REGIONAL
 WATER POLLUTION CONTROL AGENCY

Dated: October 18, 2006

MILLER, MORTON, CAILLAT & NEVIS, LLP

By: /s/
 CHRISTOPHER J. HERSEY
 Attorneys for Defendants CH2M HILL, INC.;
 CH2M HILL COMPANIES, LTD.

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ORDER

PURSUANT TO STIPULATION, IT IS SO **ORDERED**.

Dated: November 9, 2006

/s/ Ronald M. Whyte

HONORABLE RONALD M. WHYTE
United States District Court
Northern District of California

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MILLER, MORTON, CAILLAT & NEVIS, LLP
25 Metro Drive, 7th Floor
San Jose, CA 95110
Telephone: (408) 292-1765